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KOPPERS

February 4, 1986

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Mr. John Cochran
US Environmental Protection Agency
Region VI
1201 Elm Street
6AW-SE
Dallas, Texas 75270

Re: Geophysical Feasibility Survey
South Cavalcade Site

Dear Mr. Cochran:

With regard to the general comments provided in your letter of January 3, 1986, concerning the Geophysical Feasibility Survey Report, we wish to provide the following clarifications:

The geophysical feasibility survey performed at the South Cavalcade site is only one portion of a much larger, multifarious investigation. The feasibility survey was performed to determine which, if any, of three geophysical techniques would provide information useful in identifying soil boring locations. The report submitted to you on December 24, 1985 complied with that objective. In fact, considering that the RI/FS work plan called for a single field test site with a "memorandum" as a deliverable, the work performed at three test sites and the report submitted considerably exceeded the scope of work spelled out in the RI/FS work plan. It should also be noted that, because of interferences caused by reinforced concrete and access restrictions due to buildings, geophysical profiling can not be conducted in those portions of the site where the RI/FS investigation is focused, i.e. the former coal tar distillation and wood treating areas. Additional restrictions caused by wooded and trailer storage areas limit the total surface area available for geophysical profiling to approximately twenty-five percent (25%) of the total site area.

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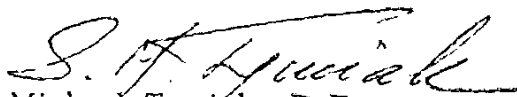
In response to the recommendations of your letter of January 3, 1986, we offer the following comments:

Based on the findings of our Geophysical Feasibility Survey Report we have conducted an electromagnetic (EM) survey over that portion of the site available for geophysical profiling, approximately twenty-fivepercent (25%). A report detailing the results of the EM survey was forwarded to your office on January 28, 1986. The results of the EM survey are being used to help define the extent of the power auger program. The power auger program will include investigation of all anomalous areas, including the test areas used for the geophysical feasibility survey. Power auger investigation of anomalous and test site areas is a natural part of a geophysical investigation, and is part of our site investigation plan. We feel that the current procedures being used for power augering and sampling are adequate for "ground truthing" the geophysical test areas. We feel that the "ground truthing" procedure outlined in your letter is beyond the scope of Subtask 2C. Further, correlation of soil augering results and geophysical survey data will be performed as a normal part of RI report preparation, and as such, we do not feel that a separate report covering correlation of geophysics and soil augering is necessary.

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Trusting that you are in agreement with our interpretation and with our current performance of the scope of work as defined in the RI Work Plan.

Sincerely yours,



S. Michael Tymiak, P. E.
Manager, Previously Operated Properties

JRC:m
KSC-RI/FS-28
Copies to:
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B. Keir-CDM